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7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA
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9 UNITED STATES OF AMERICA,
10 Plaintiff,
11 v.
12 MARC BRATTIN,
13 Defendant.

Case No. 2:13-cr-00161-APG-CWH

STIPULATION FOR PROTECTIVE ORDER

14 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden,
15 United States Attorney for the District of Nevada, Sarah E. Griswold, Assistant United States
16 Attorney, counsel for the United States, and Raquel Lazo, counsel for defendant MARC BRATTIN,
17 that this Court issue an Order protecting from disclosure to the public any discovery documents
18 containing the personal identifying information such as social security numbers, drivers license
19 numbers, dates of birth, or addresses, of participants, witnesses and victims in this case. Such
20 documents shall be referred to hereinafter as "Protected Documents." The parties state as follows:

21 1. Protected Documents which will be used by the government in its case in chief
22 include personal identifiers, including social security numbers, drivers license numbers, dates of
23 birth, addresses, and email addresses of participants, witnesses, and victims in this case.
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1 2. Discovery in this case is voluminous. Many of the documents include personal
2 identifiers. Redacting the personal identifiers of participants, witnesses, and victims would prevent
3 the timely disclosure of discovery to defendants.

4 3. The United States agrees to provide Protected Documents without redacting the
5 personal identifiers of participants, witnesses, and victims.

6 4. Access to Protected Documents will be restricted to persons authorized by the Court,
7 namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts, and
8 secretaries employed by the attorney(s) of record and performing on behalf of defendant.

9 5. The following restrictions will be placed on defendant, defendant's attorney(s) and
10 the above-designated individuals unless and until further ordered by the Court. Defendants,
11 defendants' attorneys and the above-designated individuals shall not:

12 a. make copies for, or allow copies of any kind to be made by any other person
13 of Protected Documents;

14 b. allow any other person to read Protected Documents; and

15 c. use Protected Documents for any other purpose other than preparing to defend
16 against the charges in the Superseding Indictment or any further superseding indictment arising out
17 of this case.

18 6. Defendant's attorney(s) shall inform any person to whom disclosure may be made
19 pursuant to this order of the existence and terms of this Court's order.

20 7. The requested restrictions shall not restrict the use or introduction as evidence of
21 discovery documents containing personal identifying information such as social security numbers,
22 drivers license numbers, dates of birth, addresses, and email addresses during the trial of this matter.

23 8. Upon conclusion of this action, defendant's attorney(s) shall return to government
24 counsel or destroy and certify to government counsel the destruction of all discovery documents

1 containing personal identifying information such as social security numbers, drivers license
2 numbers, dates of birth, addresses, and email addresses within a reasonable time, not to exceed thirty
3 days after the last appeal is final.

4 DATED this 13th day of MAY, 2013.

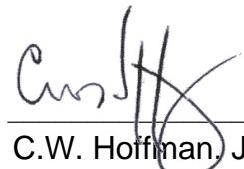
5 DANIEL G. BOGDEN
United States Attorney

7 /s/ Sarah E. Griswold
SARAH E. GRISWOLD
8 Assistant U.S. Attorney

10 /s/ Raquel Lazo
RAQUEL LAZO
11 Attorney for MARC BRATTIN

13 **ORDER**

14 IT IS SO ORDERED this 14th day of May 2013.

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17 C.W. Hoffman, Jr.
United States Magistrate Judge

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